

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	Case No. 4:15 CR 00049 CDP DDN
)	
RAMIZ ZIJAD HODZIC,)	
a/k/a Siki Ramiz Hodzic,)	
)	
Defendant.)	

FACTUAL ALLEGATIONS
IN SUPPORT OF JUDICIAL REMOVAL

Comes now the United States of America, by and through its attorneys, Jeffrey B. Jensen, United States Attorney for the Eastern District of Missouri, and Matthew T. Drake, Howard J. Marcus, and Kenneth R. Tihen, Assistant United States Attorneys for said District and hereby gives notice to Ramiz Zijad Hodzic ("the defendant") and to his attorneys of record, Kevin Curran and Diane Dragan, Assistant Federal Public Defenders, that the United States of America alleges the following facts in support of the request for an Order of Judicial Removal:

1. The defendant is not a citizen or national of the United States.
2. The defendant is a native of Yugoslavia and a citizen of Bosnia-Herzegovina ("Bosnia").
3. The defendant was admitted to the United States as a refugee under section 207 of the Immigration and Nationality Act ("INA" or "Act"), on or about February 10, 1998, at New York, New York.
4. At the time of sentencing in the instant criminal proceeding, the defendant will be convicted in the United States District Court, Eastern District of Missouri, of the following counts

charged in the Indictment: Count One, conspiring to provide material support in furtherance of a crime of terrorism, in violation of Title 18, United States Code, Section 2339A; and Count Three, providing material support in furtherance of a crime of terrorism, in violation of Title 18, United States Code, Section 2339A.

5. The maximum term of imprisonment for a conviction of Count One – conspiracy to provide material support in furtherance of a crime of terrorism, in violation of Title 18, United States Code, Section 2339A – is 15 years. The maximum term of imprisonment for a conviction of Count Three – providing material support in furtherance of a crime of terrorism, in violation of Title 18, United States Code, Section 2339A – is 15 years.

6. The defendant is, and at sentencing will be, subject to removal from the United States pursuant to Section 237(a)(4)(B) of the INA, as amended, 8 U.S.C. § 1227(a)(4)(B), as an alien described in Section 212(a)(3)(B)(i)(I) of the INA, 8 U.S.C. § 1182(a)(3)(B)(i)(I), for having engaged in terrorist activity, specifically as defined in 1) Section 212(a)(3)(B)(iv)(IV)(aa) of the INA, 8 U.S.C. § 1182(a)(3)(B)(iv)(IV)(aa), by soliciting funds or other things of value for a terrorist activity; 2) Section 212(a)(3)(B)(iv)(VI)(aa) of the INA, 8 U.S.C. § 1182(a)(3)(B)(iv)(VI)(aa), by committing an act that he knew, or reasonably should have known, afforded material support for the commission of a terrorist activity; and 3) Section 212(a)(3)(B)(iv)(VI)(aa) of the INA, 8 U.S.C. § 1182(a)(3)(B)(iv)(VI)(aa), by committing an act that he knew, or reasonably should have known, afforded material support to an individual he knew, or reasonably should have known, has committed or plans to commit a terrorist activity.

Wherefore, pursuant to Section 238(c) of the INA, 8 U.S.C. § 1228(c), the United States of America requests that the Court, at the time of sentencing, order that the defendant be removed from the United States to Bosnia.

Dated: November 12, 2019

JEFFREY B. JENSEN
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EASTERN DISTRICT OF MISSOURI

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